

Information on the processing of personal data of customers pursuant to EU REGULATION 679/2016

This document is drawn up pursuant to art. 13 of EU Regulation 679/2016 on the protection and management of personal data processing.

This information is intended to describe the methods of processing customers' personal data by **ITALCAR INDUSTRIAL S.r.l.**

The Owner of Data Treatment is the company ITALCAR INDUSTRIAL S.r.l. with registered office in Via Bruino, 36 - Rivalta di Torino (TO) in the person of VOLPE DARIO, contactable at the following mail address info@italcar.it and/or by PEC italcarindustrialsrl@pec.it also for the exercise of the rights of the interested parties listed below pursuant to articles 15 - 22 EU Reg. 679/16.

Legal Basis:

Data processing is carried out in compliance with the following legal principles (art. 6, par. 1, lett. a) b), c), f):

- request for consent: the interested party has given consent to the processing of his/her personal data for one or more specific purposes;
- fulfillment of contractual obligations;
- legal obligations to which the data controller is subject;
- legitimate prevailing interest of the controller or third parties to whom the data are communicated.

Purpose of processing:

ITALCAR INDUSTRIAL S.r.l. processes personal data for the following purposes:

- send the user useful commercial information on services and products provided;
- be able to contact the customer for commercial and service information on the products provided;
- send newsletters to keep users updated on services and products;
- correct and complete execution of the tasks received;
- give the possibility of accessing the public and/or reserved sections of the site;
- telephone or email contact;
- fulfill current administrative, accounting and tax obligations.

Processed data categories:

The types of data processed by ITALCAR INDUSTRIAL S.r.l. are identifying data such as: personal data (name and surname, tax code, address, telephone number, e-mail, bank and payment details), data relating to legal persons (personal details, contact details, bank and payment details), information to achieve effective management of business relationships and to keep customers updated on the services provided.

Browsing data: the computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the site.

Data communicated by the user: the optional, explicit and voluntary sending of messages to the contact addresses of ITALCAR INDUSTRIAL S.r.l., messages sent by users to institutional profiles/pages on social media, as well as the compilation and forwarding of the forms on the site, entail the acquisition of the sender's contact data, necessary to respond, as well as all personal data included in the communications.

The optional, explicit and voluntary sending of e-mails to the addresses indicated on this site, as well as the compilation of the forums for sending specific requests, entail the subsequent acquisition of the sender's address, necessary to respond to the requests, as well as any other personal data included in the message or in the forum.

Any refusal to provide such data entails the failure to provide the service by the company ITALCAR INDUSTRIAL S.r.l. to the extent that the data is necessary for the same

Data recipients:

The personal data relating to the processing in question will be communicated and processed by internal personnel, trained and authorized according to the instructions given by ITALCAR INDUSTRIAL S.r.l. and in full compliance with the current legislation on privacy and the GDPR. If this is necessary or in any case functional to the management of the contractual relationship and the pursuit of the legitimate interest of the owner, your data will be communicated to the following subjects:

- by subjects to whom the right to access your personal data is recognized by provisions of law or secondary or community legislation;
- by subjects to whom the transfer of your personal data is necessary or is in any case functional to the performance of our company's activity (professionals, consultants, etc.);
- subjects delegated and/or appointed by the owner to carry out activities strictly related to the pursuit of the purposes indicated above (including technical maintenance interventions on IT systems);

- may be made known to third parties for the defense of rights, as well as in compliance with the obligations established by law or regulations and upon request by the competent authorities.

Scope of communication and dissemination.

The data collected will be used by the company ITALCAR INDUSTRIAL S.r.l. for the complete and correct execution of the contract; they may be made known to third parties for the defense of rights, as well as in compliance with the obligations established by law or regulations and upon request by the competent Authorities. ITALCAR INDUSTRIAL S.r.l. does not directly transfer to third countries; it does not have an automated decision-making process relating to natural persons and does not perform profiling; however, the data could be transferred to countries within the EU and/or outside the EU by entities and/or companies receiving the data as specified above under “data recipients”.

Data storage.

The data will be stored for the entire duration of the contract. At the end of this period, ITALCAR INDUSTRIAL S.r.l. will archive all the data for a period of ten years, as required by current legislation, and then proceed with the definitive deletion of the data processed from all archives; the deletion of data, which have exceeded ten years of archiving, will be carried out in the month of January of each calendar year following the expiration.

Existence of an automated decision-making process, including profiling.

The company ITALCAR INDUSTRIAL S.r.l. does not adopt any automated decision-making process relating to natural persons, including profiling pursuant to Article 22, paragraphs 1 and 4, of Regulation (EU) no. 2016/679.

Methods of processing.

The processing is carried out by the owner and by persons authorized and expressly trained in data processing management. All processing of personal data takes place in compliance with the principles set out in Article 5 of Regulation (EU) 2016/679, which are briefly recalled here:

- lawfulness, correctness and transparency of the processing, towards the interested party;
- limitation of the purpose of the processing, including the obligation to ensure that any subsequent processing is not incompatible with the purposes of data collection;
- data minimization: that is, the data must be adequate, relevant and limited to what is necessary with respect to the purposes of the processing;
- accuracy and updating of the data, including the timely deletion of data that are inaccurate with respect to the purposes of the processing;
- limitation of storage: that is, it is necessary to provide for the storage of the data for a period of time not exceeding that necessary with respect to the purposes for which the processing was carried out;
- integrity and confidentiality: it is necessary to guarantee the adequate security of the personal data being processed.

Rights of interested parties

In relation to the data subject to the processing referred to in this information notice, the interested party is recognized at any time the right to:

- Access to their personal data (art. 15 EU Regulation no. 2016/679);
- Rectification of their personal data (art. 16 EU Regulation no. 2016/679);
- Erasure of their personal data (art. 17 EU Regulation no. 2016/679);
- Restriction of their personal data (art. 18 EU Regulation no. 2016/679);
- The portability of their personal data, understood as the right to obtain from the data controller the data in a structured, commonly used and machine-readable format to transmit them to another data controller without impediments (art. 20 EU Regulation no. 2016/679);
- The right to object to the processing of your data in the cases provided for by law (art. 21 EU Regulation no. 2016/679);
- To withdraw consent to the processing of your personal data, without prejudice to the lawfulness of the processing based on the consent acquired before the withdrawal (art. 7, par. 3 EU Regulation no. 2016/679). In any case, the withdrawal of consent to the processing of the personal data of the interested party will result in the termination of the ongoing employment or collaboration relationship, as consent to the processing of data is an essential requirement for the correct execution of the employment or collaboration relationship.
- To lodge a complaint with the National Authority for the Protection of Personal Data, with headquarters in Piazza Venezia no. 11, 00187 Rome (art. 77 EU Regulation no. 2016/679) in the event of violation of your rights.